

**DOD INTERACTION
WITH NONGOVERNMENT
STANDARDS BODIES**




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RESEARCH AND
ENGINEERINGFOREWORD

The MI Circular A-119, "Federal Participation in the Development and Use of Voluntary Standards," and DoD Directive 4120.3, "Defense Standardization and Specification Program" establish a policy of federal government reliance on nongovernment standards in preference to military and federal **documents** wherever feasible and consistent with law and regulation. The DoD has pursued this course for many years and is now doing so with increased vigor. It is DoD policy to participate in their development, and to adopt and use nongovernment standards to the extent feasible, practical, and economical. The adoption and use of acceptable nongovernment standards helps to ensure DoD use of products and practices which are readily available in the commercial marketplace, while minimizing the need to prepare and maintain military **documents**.

This **document** has been prepared to help nongovernment standards bodies select the most appropriate approach for interacting with the DoD. We are **committed** to the use of nongovernment standards, and we hope that a good understanding of the preferred procedures for such interaction will enable us to work together more effectively to our mutual benefit.



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DEFINITION OF TERMS

The following words and terms have the following meanings with respect to their use in this document.

Acceptance Notice. Document which indicates adoption by the DoD of a specific issue of a nongovernment standard.

Acquisition and Distribution of Commercial Products (ADCOP). A government program for optimizing reliance on readily available commercial products where such products will satisfy the government's needs.

Activity. One of the organizational elements of the Army, Navy, Air Force, Defense Logistics Agency (DLA), General Services Administration (GSA), and other elements of the federal government.

Assignee Activity. The activity to which the management responsibility for standardization in a Federal Supply Class (FSC) has been delegated.

Lead Service Activity. The activity to which the management responsibility for standardization in an engineering or technology area (Area Assignment) has been delegated.

Military Coordinating Activity. The military activity responsible for coordinating, reconciling, and collating DoD comments and for adopting nongovernment standards.

Preparing Activity. The DoD activity responsible for preparing and maintaining standardization documents or the conduct of study projects.

Review Activity. An activity having essential technical interest in a standardization document requiring review of all proposed actions affecting it.

User Activity. An activity which uses a standardization document but whose interest does not normally require participation in the coordination of the document.

Adopt . Formally express acceptance, by the DoD, of a specific issue of a non-government standard.

Area Assignment. A standardization category encompassing a technology or engineering subject applicable to more than one FSC. Area assignments are made for a variety of broad engineering disciplines, practices, and technologies.

Coordinated Document. A document approved for use in which interest is expressed by more than one department or agency of the DoD.

Custodian. An activity responsible for coordinating standardization projects within its own department/agency.

Department of Defense Index of Specifications and Standards(DoDISS). A publication which lists federal and military specifications, standards, and related standardization documents, and adopted nongovernment standards.

DoDISS NOTICE. A weekly publication which provides advance information about selected new and revised military, federal, and DoD adopted nongovernment standardization documents. It is mailed automatically to area assignment or FSC subscribers.

Federal Supply Classification (FSC) Classes. The classes used to designate families of commodities.

Limited Coordination Document. A document approved for use in which interest is expressed by only one department or agency of the DoD.

Nongovernment Standard. A standardization document (standard, specification, test method, etc.) developed and published by a nongovernment standards body.

Nongovernment Standards Body. A scientific, technical, professional or other organization, society or association, not organized for profit which conducts professional standardization activities.

Project Number. A combination of either an FSC or standardization area designator with a sequentially assigned number used for management of standardization projects within the DoD.

Standardization Directory (SD-1). A document issued quarterly that identifies standardization responsibility assignments by FSC's and areas, and lists addresses of the military offices and federal civil agencies participating in the DSSP.

DoD Interaction with Nongovernment Standards Bodies

1. INTRODUCTION

This document is intended to give Nongovernment Standards Bodies (NGSBS) an understanding of the Department of Defense (DoD) Standardization and Specification Program (DSSP) and to explain how they can interface with DoD in the development, adoption, and use of nongovernment standards. It describes how standards are adopted, provides the criteria used for adoption, and explains DoD participation in the document preparation process.

It is DoD policy to adopt and use nongovernment standards where practical, feasible, and economical. This policy is being emphasized in recognition of the potential efficiencies involved. When nongovernment standards satisfy requirements it is usually more cost effective for the DoD to adopt and use them than it is to prepare military documents. Nongovernment standards frequently provide the vehicle for purchase of commercially available and acceptable products at lower cost. DoD purchase of commercially available products will be enhanced when nongovernment standards are available which define commercial needs of the DoD in terms of the commercial marketplace.

The DoD currently has many specifications for items which are not inherently military. They include surgical instruments, office furniture, subsistence products, etc. In the past DoD documents were developed where suitable documents did not exist elsewhere. DoD is looking to the private sector to prepare documents covering non-military products and related engineering standards (test methods, quality assurance, etc.). Where they exist, or can be prepared, they will be used, thus freeing DoD's resources for concentration on military items. DoD use of a nongovernment standard may consist of direct copying, with permission, in a government document, referencing the nongovernment standard in a government document, or direct use of the document in acquisition. The specific approach will depend on the need, the type of nongovernment standard involved, and agreements with the NGSB.

Adoption of nongovernment standards started in 1962 when 12 documents were brought into the system. Since then the number has increased dramatically. The DoD is not the only beneficiary in this program. NGSBS also benefit from DoD adoption and use of their documents. The DoD employs scientists and engineers, many of whom are leaders in their fields, and may offer valuable contributions through DoD participation in document development. In addition, adoption broadens the use of a nongovernment standard directly through defense contracts and indirectly through the added visibility provided by its inclusion in the Department of Defense Index of Specifications and Standards (DoDISS).

2. HOW THE DEFENSE STANDARDIZATION AND SPECIFICATION PROGRAM (DSSP) IS ORGANIZED

The 1952 Cataloging and Standardization Act (Title 10 USC Sections 2451-2456) provides the legislative basis for both the DSSP and the Federal Cataloging Program. The Federal Supply Classification (FSC) system was developed to support the cataloging program and is used as a basis for work assignments within the DSSP. The FSC system is sufficiently comprehensive to permit the classification of all items

of supply by using a four-digit coding structure. The first two digits of the code number identify a supply group, and the last two digits, the supply class within a group. For example, the number 5133 indicates group 51 - "handtools;" and class 33 within that group which is "drill bits, counterbores, and counter-sinks, hand and machine." Expansion has been provided for by having unassigned numbers between groups and classes. For standardization efforts related to technology or engineering practices applicable to more than one FSC, a set of "Standardization Areas" has been established. They include practices, processes, and disciplines such as DRPR - DoD Standard Drawing Practices; RELI - Reliability; PACK - Packing, Packaging, Preservation, and Transportability; etc.

The FSC/Area system is used by the standardization community as a way to codify and catalog standardization documents. Documents which have been issued in the FSC and Standardization Areas are listed in the DoDISS which is available from the Superintendent of Documents, U.S. Government Printing Office, Washington, DC 20402.

Within the DSSP, responsibility for the management of standardization within an FSC or Area is assigned to a department or agency¹ of the DoD and delegated to an Assignee Activity (AA) or Lead Service Activity.² Area Assignments, FSCs and cognizant Lead Service Activities and AA's are listed in the "Standardization Directory, SD-1." SD-1 provides³ mailing addresses and telephone numbers for each Lead Service Activity/AA.²

3. HOW ADOPTION AND PARTICIPATION WORK

The DoD participates in the standards development activities of NGSBs and adopts nongovernment standards. These functions are closely integrated but remain separate and distinct. The DoD participates in the standardization activities of NGSBs in accordance with the policy principles of OMB Circular A-119, "Federal Participation in the Development and Use of Voluntary Standards." ³ Where they meet DoD needs, standards prepared by NGSBs will be adopted and used by the DoD.

Assignee Activities are responsible for maintaining a continuous awareness of projects intended to result in nongovernment standards within the area of their assignments. Some activities manage many FSCs and because many different NGSBs, each with its own set of working committees, prepare standards, the task of maintaining awareness is often difficult. When NGSBs help keep AA's apprised of projects, they will be better able to carry out their assignments.

1. For purposes of this document, unless otherwise specified, FSC refers to Federal Supply Class and Standardization Area; Assignee Activity refers to Assignee Activity and Lead Service Activity.

2. SD-1 is printed quarterly and is available on request from the Naval Publications and Forms Center, 5801 Tabor Avenue, Philadelphia, PA 19120. NGSBs which have negotiated document availability with the DoD have been listed in the Defense Standardization Manual, DoD 4120.3-M, and are on automatic distribution.

3. Although OMB A-119 uses the term "voluntary standard," the DoD prefers "nongovernment standard" and will continue its use.

NGSBS that prepare standards are encouraged to seek DoD input either through a DoD representative to the group or through correspondence. The system of AA's and Lead Service Activities described earlier provides a clear set of contact points stratified by FSC. The remainder of this document is a guide for standards adoption and DoD participation during development from the first contact through final acceptance of the **nongovernment** standards.

4. ADOPT 10N

Adoption is the process by which DoD expresses formal acceptance of a specific issue of a nongovernment standard. Adoption of a specific issue of a nongovernment standard assures the DoD of internal control of the document in much the same manner as federal and military documents are controlled. The adopted issue is the one listed in the DoDISS and is the only version authorized for use by the DoD. Nongovernment standards which require modifications, additions or deletions to make them suitable for DoD use are adopted on a limited basis through issuance of a government document which details the required changes. The adoption of a document offers the following advantages:

- a. Adoption provides visibility for the document through its appearance in the DoDISS.
- b. An adopted document is given a higher order of precedence for selection and use in DoD acquisition programs than one which has not been formally adopted.
- c. Adoption makes the document available to DoD components from the Naval Publications and Forms Center (NPFC).
- d. The proliferation of duplicative documents is reduced.

4.1. ADOPTION CRITERIA

Certain criteria concerning applicability to DoD needs and document availability are examined prior to initiating a project to adopt a **nongovernment** standard. With regard to applicability, documents which fully satisfy the needs of the DoD with respect to technical sufficiency and economy are generally adopted when one or more of the following conditions exist:

- a. No satisfactory military document is available and a satisfactory **non-government** standard is available, or a NGSB is willing to provide a document in time to meet DoD needs.
- b. Adoption of the nongovernment standard will provide the DoD with a document more technologically current than one already in the DoD system; and the cost of the product or service covered by the **nongovernment** standard will be less than the product or service procured to the military document it is intended to replace.
- c. The nongovernment standard has potential for widespread use in the DoD which can be satisfied through adopting and listing in the DoDISS.

d. Internal control over changes to the nongovernment standard is essential to preserve its utility to the DoD.

e. Adoption of the nongovernment standard would deter the proliferation of other similar duplicative documents within the DoD system.

f. Adoption of the nongovernment standard would enhance the program for the Acquisition and Distribution of Commercial Products (ADCoP).

A document may meet all of the above criteria but if it is not readily available or becomes unavailable after adoption, it is of little use to the DoD. Specific availability requirements are negotiated by the Naval Publications and Printing Service Office (NPPSO) in Philadelphia, Pa. It is necessary that sufficient copies of the document, either purchased or reproduced with permission, be available to satisfy DoD needs. NGSBS interested in participating in this program should contact the Director, Naval Publications and Printing Service Office (NPPSO), 600 Robbins Avenue, Philadelphia, PA 19111, for more detailed information on document availability requirements. NGSBS which have reached agreement with NPPSO in this regard are listed in the DoD Standardization Manual, DoD 4120.3-M.

4.2 DoD ADOPTION PROCEDURE

4.2.1 Initial Steps

A nongovernment standard may be introduced into the adoption process in several ways. DoD staff participation in the activities of the standards writing committee or working group is one way (see Section 6). Other possibilities are:

a. When a DoD activity identifies a need for a new or revised document, it will see if a satisfactory nongovernment standard already exists or if a project is currently underway to develop one.

b. If a standard does not exist and time permits, the activity will encourage a NGSB to prepare one.

c. A NGSB may recognize a DoD need and offer an existing document for adoption. In this case, the NGSB should present the proposal to the cognizant AA. That activity will work with the NGSB to determine the initial feasibility of the proposal. A Military Coordinating Activity (MCA) will be appointed by the AA to coordinate the document within DoD.

4.2.2. Processing

In any of these cases if the document in question will satisfy DoD needs and other adoption criteria, the MCA will coordinate the document. An adequate quantity of documents must be available for coordination and we ask that 12 copies be provided free for this process. Another alternative would be to allow limited royalty free rights to reproduce for coordination purposes only. Other arrangements may be worked out on a case by case basis. Based on the results of coordination, the MCA will do one of the following:

a. If all interested activities accept the document as written, proceed to adopt it as a coordinated document.

b. If some or all of the interested activities object to the use of the document, the MCA will review the objections, attempt to resolve issues with objectors and the NGSB, and make a determination to either terminate the adoption process or to adopt it for use by only those activities who concur in its use.

c. If modifications, additions, or deletions (such as the addition of a part numbering system for DoD use) are required, the MCA will:

(1) Attempt to get DoD requirements included in the non-government standard as a "when specified" paragraph or as an appendix (usually at the next revision).

(2) Make other arrangements for handling DoD requirements.

(3) As a last resort, prepare a Commercial Item Description (CID), federal or military specification or standard, stating the unique DoD requirements and making the nongovernment standard the primary reference.

Based on the results of coordination, the MCA will prepare either an Acceptance Notice (discussed in the next section) or the appropriate military or federal document.

The MCA will arrange for printing and distribution of the Acceptance Notice or military document through the NPFC. A copy of the Acceptance Notice will be provided to the NGSB. The MCA will request coordination on future revisions to the document and where a government document was issued, will attempt to have DoD requirements accommodated in a future revision. Copies of the document will be purchased or reproduced with permission to meet DoD needs, and indexed in the DoDISS .

Finally, NPFC will distribute the Acceptance Notice or government document, provide notification of the adoption in the DoDISS Notice and make the non-government standard available to the DoD. NPFC does not distribute adopted nongovernment standards outside of the DoD. Other government activities, contractors, and other users must obtain copies from the issuing NGSB, commercial document services, or libraries.

4.3 ACCEPTANCE NOTICE

The Acceptance Notice is used to indicate adoption by the DoD of a non-government standard. It provides important information to DoD users including:

- a. Number, title, and date of issue of the adopted document.
- b. Name and address of issuing NGSB.
- c. Extent of coordination.
- d. Military custodians, review activities, user activities, MCA, FSC, and project number.
- e. Supersession information.

Acceptance Notices are made an integral part of documents supplied to DoD users from NPFC.

5. PARTICIPATION

5.1 Official DoD Representation

Official DoD, Service, or activity liaison representatives are formally designated by the AA. There is no intent to limit DoD participation to a single representative; however, the representative from the MCA will be the DoD focal point representative. For representation to be effective, it is essential that it begin in the early drafting stages of the nongovernment standard. The objective is to make DoD's needs known to the standards writing committee, subcommittee or working group, and, where appropriate and committee agreement is obtained, to have those needs accommodated in the document by inclusion, reference or other suitable means. DoD will not attempt to militarize **non-**government standards. But often DoD needs apply to other users and inclusion of a "when specified" paragraph can accommodate them without adversely affecting other use of the document. This makes the document more readily adoptable by the DoD and minimizes the need for issuing government documents invoking changes to the nongovernment standard for DoD use. Every effort will be made to accept nongovernment standards as written without DoD unique modification.

5.2 DoD Employee Participation

It is important to recognize that there is a difference between official DoD representation and other participation by DoD employees in nongovernment standards activities. Many employees of the DoD because of personal or professional interest, are members of technical/professional societies and associations and serve on their standards writing committees. Such participation does not constitute official DoD representation. It is not discouraged, however, since it does foster good relationships and vital interplay between government and the private sector and often leads to official action by the DoD to adopt documents or to provide official authorized representation to the committee.

5.3 Criteria for Participation

The DoD will participate in the preparation of nongovernment standards where:

- a. The DoD has a significant interest in the practices, processes or products, being described and has requirements which must be accommodated for the document to be usable by the DoD.

- b. The project is likely to result in a document or documents which will meet DoD needs for technical sufficiency and timely publication.

- c. The **document** or documents, when published, will be able to meet DoD's availability requirements.

d. The project is not a duplication of other DoD or nongovernment standards activity.

e. DoD representatives are provided voting privileges on technical matters.

Where these criteria are met, one or more official liaison representatives will be appointed to the standards writing committee, subcommittee or working group. While adequate representation is essential to the attainment of DoD standardization objectives, excessive representation is discouraged. A roster of all official appointments by DoD activities is maintained by the AA for each FSC class.

5.4 How to Get DoD Participation

When a NGSB initiates the preparation or revision of a document considered to be of interest to DoD and official DoD participation in the committee or working group is desired, the following procedures should be followed:

a. When a previously adopted nongovernment standard is being revised, notify the MCA by letter, and request DoD participation. The address and phone number of the MCA can be obtained from the SD-1. The activity code (as listed in the SD-1) can be obtained from the previous Acceptance Notice or from the DoDISS.

b. When a NGSB is developing a new document or revising one which has not been previously adopted, review the SD-1 to determine the appropriate FSC and the AA for that class (see Section 2). If unable to identify the appropriate FSC, notify the Director, Defense Materiel Specifications and Standards Office, 5203 Leesburg Pike, Suite 1403, Falls Church, VA 22041, of the need for participation and that office will identify an appropriate DoD contact point.

c. By letter, advise the MCA or the AA of the project and request participation. State the need for such participation. A copy of the purpose, scope and charter of the committee or working group should accompany the letter unless such information has already been provided.

d. The DoD will appoint a representative, request that DoD input be through correspondence, or decline to participate. Where applicable, the DoI) will request that the final draft of the document be provided to the DoD for coordination and possible adoption.

5.5 Rules Governing DoD Participation

Persons appointed as official liaison representatives are expected to represent the entire DoD. In some cases, however, a single representative cannot adequately represent the entire DoD because of unique Service needs. In these cases, more than one representative should be appointed, but one of those appointed will be designated the principal DoD liaison representative and will normally be the focal point for all DoD actions.

Every effort is made to provide full DoD representation. Due to the magnitude and diversity of DoD interests, however, a coordinated response that represents the entire DoD is seldom possible during formulation of the document. The participation and vote of a DoD representative during the formulation of a document may not be considered to bind the DoD to any particular present or future course of action nor to imply compliance or concurrence by the government. While the express purpose of DoD representation is to enhance the adoption potential of a nongovernment standard, the actual adoption process (described earlier) is separate and distinct. Documents prepared by groups including DoD representation can be rejected in the adoption process. While this is not likely, it is important to realize that it is a possibility.

DoD representatives serving as members of standards-developing groups should participate actively in the standards activities of those groups but, in doing so, should not seek to dominate such groups. Active participation is intended to include full involvement in discussions and technical debates, registering of opinions and, if selected, serving as chairpersons or in other official capacities on such groups. DoD representatives may vote at each stage of standards development. Participation by DoD representatives in the policy-making process of NGSBS is encouraged -- particularly in matters such as establishing priorities, developing procedures for preparing, reviewing, and approving standards, and creating standards-developing groups. In order to maintain the private, nongovernment nature of such bodies, however, DoD representatives should refrain from decisionmaking involvement in the internal day-to-day management of such bodies (e.g., selection of salaried officers, employees, and establishment of staff salaries).

5.6 Legal Constraints

The following legal restrictions are quoted from DoD Directive 5500.2, "Policies Governing Participation of Department of Defense Components and Personnel in Activities of Private Associations," and are provided for information:

- "A. Department of Defense Components are authorized to participate in activities of scientific, technical professional and other organizations, societies and associations in the discussions of matters of mutual interest, otherwise consistent with law, including antitrust laws, and law relating to security and subject to DoD Directive 5500.7 (reference (b)). (Standards of Conduct).
- "B. Participation by Department of Defense Components in the activities of private or nongovernmental associations or societies shall be limited to the extent of the Department of Defense interest involved and shall be upon such basis as will avoid (1) the favoring of one association or organization over another; (2) the unauthorized acceptance of legal membership by the United States in private organizations; (3) the use of the name of the United States Government by a private organization, voluntary association or corporation, implying the sponsorship of such organization by the Government, without authority of Congress; (4) participation in the management and control of such organization without Congressional authorization; and (5) participation in the determinations or conclusions of private

organizations or associations, in such manner as to suggest compliance therewith by the Government without subsequent responsible administrative authority or Congressional authorization.

- "C. Subject to the above limitations, liaison representatives of Department of Defense components while participating in the activities of scientific, technical, professional and other organizations, societies and associations, including technical committees and standards committees thereof, may give free and complete expression of their views on the subject matter under discussion and may vote verbally or in writing on issues presented for a vote, providing it is made clear to the private organizations, societies, and associations that such vote indicates no more than the opinion on that issue of the liaison representative of the DoD component voting. No vote so cast shall be considered to bind the Department of Defense or any component thereof in any way to any particular present or future course of action.
- "D. DoD personnel shall not accept an honorary office or honorary membership in any trade or professional association which includes in its membership business entities which are engaged or are endeavoring to engage in providing goods and/or services to a component of the Department of Defense including non-appropriated fund activities of the Department of Defense. An honorary office includes any office, whether termed honorary or not, when the selection for that office is on the basis of an official Department of Defense position or assignment.
- "E. These policies shall not apply to membership or participation by officers or employees of the Department of Defense, as individuals, in private organizations or associations, including technical and professional societies, and military or veterans organizations, otherwise consistent with law, including the Hatch Act and Anti-Lobby Act, and other laws which prohibit Government officers and employees from engaging in activities inconsistent with their government employment."

6. ADMINISTRATIVE FEES AND ORGANIZATIONAL MEMBERSHIPS

DoD policy encourages participation in NGSB standards activities. In order to do this, some NGSBS require payment of organizational or individual fees. While the DoD is expressly prohibited from paying individual membership fees (see Decisions of the Comptroller General B-177596 and B-160579), there is no restriction on paying administrative fees to cover the costs of selected DoD representatives. These fees are normally required to offset costs of secretarial or staff work, duplicating, mailing, etc. Payment of such fees is handled differently by different activities to suit the requirements of the NGSB and the particular circumstance. Although participation and paying a fair share of administrative costs is encouraged by DoD policy, the final decision to pay is in the hands of the local commander or director who must balance all the priorities of his activity.

It is important to note that, in accordance with the provisions of OMB A-119, DoI) individuals who participate at government expense do so as representatives of the DoD or their activities. Where administrative fees for individual representatives have been paid, the DoD must retain the right to substitute alternate personnel. Even though an individual may be named as a regular participant and receives some benefits of membership, the fee has been paid for the activity (command, base, station) to have a representative. It is the activity's right to name whomever it feels is appropriate to represent them. Benefits are accruable to the DoD activity rather than the individual representative. Nothing in this section, however, precludes any DoD employee from joining and participating in any NGSB at his own expense.

Sometimes it is in the best interest of the DoD to acquire organizational memberships in NGSBS. This may be done at an activity, Service agency, or DoD level depending on the particular situation. Benefits to the DoD such as free or discount publications, technical reports, voting privileges, and participating on planning boards are considered in making this decision.

7. SUMMARY

The procedures outlined in this document are directed toward increasing the volume of nongovernment standards adopted for DoD use and defining the process by which they are adopted. The SD-9 will be updated to reflect new policies and improved procedures as necessary.

NGSBS are encouraged to establish liaison with AA's. Such relationships will result in a continuing exchange of information relative to DoD needs and will provide the opportunity for keeping the DoD abreast of national standardization activities .